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# Clark County Regional Support Network Policy Statement

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**Policy No.:** QM04  
**Policy Title:** Fraud and Abuse  
**Effective Date:** July 1, 2004

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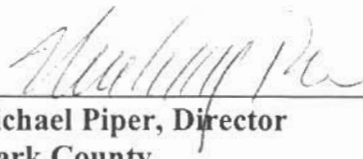
**Policy:** The Clark County Regional Support Network (CCRSN) shall establish administrative and management procedures to guard against fraud and abuse. CCRSN will demonstrate commitment by developing and adhering to a Fraud and Abuse Compliance Plan in accordance with state and federal requirements.

**Reference:** WAC 388-865-0280 (2) (e); Medicaid Alliance for Program Safeguards 2002 Document: "Guidelines for Constructing a Compliance Program for Medicaid Managed Care Organizations and Pre-Paid Health Plans"; National Medicaid Fraud and Abuse Initiative October 2000 Document: "Guidelines for Addressing Fraud and Abuse in Medicaid Managed Care"; State MHD Contract with CCRSN; Clark County Human Resources Policies and Procedures Governing CC Employees, Clark County RSN Fraud and Abuse Compliance Plan, CFR 42 438 Subpart H: Certifications and Program Integrity

**Procedure:**

- 1) CCRSN shall follow the procedures established in the Clark County RSN Fraud and Abuse Compliance Plan attached to this policy, including:
  - a) Designation of a Compliance Officer and a Compliance Committee accountable to senior management.
  - b) Effective lines of communication between the Compliance Officer, RSN employees and the RSN's contracted network of Community Mental Health Agencies (CMHA).
  - c) Prompt response to detected offenses and development of corrective action initiatives.
- 2) CCRSN shall enforce standards through well-publicized disciplinary guidelines.
- 3) CCRSN shall ensure that the policies, procedures and standards of conduct comply with all applicable federal and state standards.
- 4) CCRSN shall provide for internal monitoring and auditing.
- 5) The compliance officer, RSN staff and selected staff of CMHAs will participate in effective, ongoing training, including training provided by Center Medicaid and Managed Care Services and the Washington State Mental Health Division.

Approved By: \_\_\_\_\_



**Michael Piper, Director**  
**Clark County**  
**Department of Community Services**

Date: \_\_\_\_\_

7-6-05